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Attorneys for Plaintiff
SCOTT BRYNING

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SCOTT BRYNING,

Plaintiff,

v.

BEST BUY CO., INC., a Minnesota
Corporation doing business in California as
MN BEST BUY CO., INC.; BEST BUY
STORES, L.P., a Virginia Limited
Partnership, and DOES 1 through 20,
inclusive,

Defendants.

CASE NO. 3:07-cv-05741-JSW

DECLARATION OF WILLIAM F.
ADAMS IN SUPPORT OF REQUEST
TO EXTEND NON-EXPERT
DISCOVERY CUT-OFF

Honorable Jeffrey S. White

I, William F. Adams, do hereby state and declare as follows:

1. I am the attorney for the plaintiff SCOTT BRYNING in the within action.
2. I request that the Court extend the deadline for non-expert discovery from Sunday, June 1, 2008, to Monday, June 30, 2008.
3. There is good cause for the request in that plaintiff's counsel has a trial in July beginning July 7 through July 25, 2008, in Superior Court which discovery cut-off necessitates the taking of multiple depositions until the June 6 non-expert discovery cut-off throughout California, including Southern California. Thereafter, expert depositions will be taken and other pre-trial motions and hearings have been scheduled/are anticipated.
4. The defendant has requested a similar amount of time (28 days) from July 11, 2008, to

1 August 8, 2008, to move the summary judgment hearing cut-off to which the plaintiff has
2 agreed. The plaintiff is asking for parity in the amount of time extended to both deadlines.
3 The defendant has only agreed to move the non-expert discovery deadline through June 20,
4 2008.

5 5. The parties have also been delayed in completion of discovery because they have been
6 attempting diligently to settle the matter informally.

7 6. The plaintiff is not seeking to move or extend any other deadline. There have been no
8 prior extensions sought or granted in this matter by either party.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed within the United States on May 20, 2008.

11
12 By:



13 William F. Adams

14 Attorneys for Plaintiff SCOTT BRYNING
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